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October 17, 2002

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

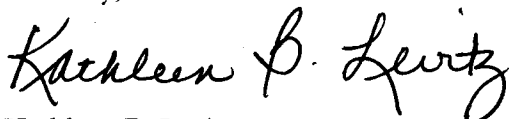
Re: WC Docket No. 02-307 – Ex Parte # 1

Dear Ms. Dortch

This is to inform you that on October 16, 2002, I met with members of the FCC staff. Lisa Foshee, Al Varner and Ike Byrd, also representing BellSouth, participated in this meeting by telephone. FCC staff members participating in the meeting included: Christine Newman; John Minkoff; Pam Megna; Craig Stroup; Denise Coca; and Rodney McDonald. The purpose of the meeting was to discuss the reasoning that led BellSouth to rely upon performance data generated using the rules of the Florida interim SQM in the BellSouth application for authorization to provide interLATA service in Florida. The attached document entitled "Comparison of Florida PSC 271 Measures with Florida Permanent Measures. We also discussed how the Florida Permanent Measures differed from the Florida Interim Measures. The attached document entitled "Comparison of Florida Permanent Measures with Florida PSC 271 Measures."

In accordance with Section 1.1206, I am filing this notice and the accompanying attachment electronically and request that you please place them in the records of the proceedings identified above. Thank you.

Sincerely,



Kathleen B. Levitz

Attachment

cc: Denise Coca (w/o attachment)
Christine Newcomb (w/o attachment)
Rodney McDonald (w/o attachment)
Janice Myles
Luin Fitch
Beth Keating

John Minkoff (w/o attachment)
Pam Megna (w/o attachment)
Craig Stroup (w/o attachment)
James Davis-Smith
Sara Kyle

Comparison of Florida PSC 271 Measures with Florida Permanent Measures

VERSIONS OF DATA

- FL data per Georgia SQM
 - Filed with FPSC through June 2001
- FL data per Interim FL SQM (Florida PSC 271)
 - Filed with 271 Application
 - Virtually identical to above (Collocation and Change Management standards)
 - Used by FL PSC for 271 decision
- FL data per FL Permanent SQM
 - Began with May 2002 data
 - Not relied on by BST or FPSC for 271

Comparison of Florida PSC 271 Measures with Florida Permanent Measures

Florida PSC 271

- 75 Measures
- 2300+ sub-metrics
 - Same 600 as permanent measures with only 1 version of P-1, P3 and P-4

Florida Permanent

- 72 Measures
 - 5 LNP Measures removed, no effect on sub-metrics, included in existing measures
 - 2 Bona Fide Request Measures removed
 - 2 Provisioning Measures added
 - 2 Billing Measures added
- 3400+ sub-metrics
 - 500 sub-metrics for additional disaggregation
 - 600+ sub-metrics for new measures
 - 600 sub-metrics with additional versions of P-1, P-3 and P-4

- Differences in orders are mainly new measures, disaggregations, business rule and minor exclusions changes

- Detailed Differences on Exhibit

Comparison of Florida PSC 271 Measures with Florida Permanent Measures

Florida PSC 271

- Extensive Audits in Georgia and Florida
- Virtually identical data have been filed with the other 8 state commissions and they approved their 271 case based on these data.
- Florida approved their 271 case based on Fla PSC 271 set (differences only standards for collocation and change management.)
- 7 states approved by FCC using virtually this SQM
- Georgia version of data have been in production for approximately 18 months and thoroughly evaluated by the CLECs

Florida Permanent

- Where the same measures are in both orders, the Third Party Tests in both Georgia and Florida apply
- Differences from Florida PSC 271 order have not been audited
 - Will not be completely audited until the next review of SQM is completed in Florida
- Posted for first time in May 2002
- New measures, disaggregations, business rule updates and benchmark and analogue changes

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Comparison of Florida Permanent Measures with Florida PSC 271 Measures

Measurement Description	Florida Permanent SQM	Florida PSC 271
OSS – 1 to 3 and PO-1 & 2	Miscellaneous wording changes, minor exclusion changes and clarifications	
OSS – 4	Benchmark: Avg. Interval	Benchmark: Parity Retail
O – 1 to 4, 7, 10	Miscellaneous wording changes, minor exclusion changes and clarifications	
O – 5, 6	Miscellaneous wording changes and clarifications	
O – 8: Reject Interval	Minor Exclusion changes Added Disaggregation: UNE Digital Loops < DS1 UNE Digital Loops ≥ DS1 UNE Line Splitting EELs Benchmark: 97% ≤ 1 hour 95% ≤ 10 hours 95% ≤ 24 hours 95% ≤ 36 hours	In Other Design In Other Design In Line Sharing In Combo Other Benchmark: 97% ≤ 1 hour 85% ≤ 10 hours 85% ≤ 24 hours 85% ≤ 4 days
O – 9: FOC Timeliness	Changed Business Rules to add Electronic Facility Check Minor Exclusion Changes Added Disaggregation: UNE Digital Loops < DS1 UNE Digital Loops ≥ DS1 UNE Line Splitting EELs Benchmark: 95% ≤ 3 hours 95% ≤ 10 hours 95% ≤ 24 hours	In Other Design In Other Design In Line Sharing In Combo Other Benchmark: 95% ≤ 3 hours 85% ≤ 10 hours 85% ≤ 36 hours

Comparison of Florida Permanent Measures with Florida PSC 271 Measures

Measurement Description	Florida Permanent SQM	Florida PSC 271
- Local Interconnection Trunks	95% <= 48 hours	85% <= 10 days
O – 11: Firm Order Confirmation and Reject Response Completeness	Minor Exclusion Changes Added Disaggregation: UNE Digital Loops < DS1 UNE Digital Loops ≥ DS1 UNE Line Splitting EELs	In Other Design In Other Design In Line Sharing In Combo Other
O – 12: Speed of Answer in Ordering Center	Miscellaneous wording changes and clarifications	
O – 13: LNP % Rejected Service Requests	Deleted measure added as Disaggregation in O - 7	
O – 14: LNP Reject Interval Distribution and Average Reject Interval	Deleted Measure added as Disaggregation in O - 8	
O – 15: LNP FOC Timeliness Distribution and FOC Average Interval	Deleted Measure added as Disaggregation in O - 9	
P – 1: Mean Held Order Interval	Changed Business Rule to all Held Orders not just at end of period and Minor Exclusion Changes Added Disaggregation: UNE Line Splitting EELs	In Line Sharing In Combo Other
P – 2: Average Jeopardy Notice Interval & % of Orders Given Jeopardy Notice	Miscellaneous wording changes, minor exclusion changes and clarifications Added Disaggregation: UNE Line Splitting EELs	In Line Sharing In Combo Other
P – 3: % Missed Initial Installation Appointment	Not Ordered in 9-10-01 but included in 2-12-02 Minor Exclusion Changes	
P – 3A: % Missed Installation Appointments including Subsequent Appointments	New Measure	

Comparison of Florida Permanent Measures with Florida PSC 271 Measures

Measurement Description	Florida Permanent SQM	Florida PSC 271
P – 4: Average Completion Interval (OCI) - xDSL Loops without conditioning - xDSL Loops with conditioning	Not Ordered in 9-10-01 but included in 2-12-02 Minor Exclusion Changes	Benchmark: 7 Days 14 Days
P – 4A: Average Order Completion & Completion Notice Interval - xDSL Loops without conditioning - xDSL Loops with conditioning	New Measure Benchmark: 5 Days 12 Days	
P – 5: Average Completion Notice Interval	Minor Exclusion Changes Added Disaggregation: UNE Line Splitting EELs	In Line Sharing In Combo Other
P – 6: % Completions Attempts w/o notice or < 24 hours notice	Minor Exclusion Changes Benchmark: < 5% Added Disaggregation: UNE Line Splitting EELs	Benchmark: Diagnostic In Line sharing In Combo Other
P – 7: Coordinated Custom Conversion Intervals	Miscellaneous wording changes and clarifications	
P – 7A: Coordinated Customer Conversions – Hot Cut Timeliness - Time Specific/Non-Time Specific - IDLC	95% +- 15 Minutes of Scheduled Time 95% within 4 hour window	95% +- 15 Minutes of Scheduled Time
P - 7B	Miscellaneous wording changes, minor exclusion changes and clarifications	
P – 7C & 8	Miscellaneous wording changes and clarifications	
P – 9: % Provisioning Troubles in 30 Days	Minor Exclusion Changes Added Disaggregation:	

Comparison of Florida Permanent Measures with Florida PSC 271 Measures

Measurement Description	Florida Permanent SQM	Florida PSC 271
	UNE Line Splitting EELs	In Line Sharing In Combo Other
P – 10: Total Service Order Cycle Time	Minor Exclusion Changes Added Disaggregation: 2W Analog Loop with INP Design 2W Analog Loop with INP Non Design UNE Line Splitting EELs	In Line Sharing In Combo Other
P – 11: Service Order Accuracy	Miscellaneous wording changes and clarifications	
P – 12: LNP % Missed Installation Appointments	Deleted measure added as Disaggregation in P-3A	
P – 12: Average Disconnect Timeliness	Miscellaneous wording changes and clarifications	
P – 13: LNP Total Order Cycle Time	Deleted measure added as Disaggregation in P-10	
M&R – 1: % Missed Repair Appointments	Added Disaggregation: UNE Digital Loops < DS1 UNE Digital Loops ≥ DS1	Not reflected in MSS included in Exhibit PM-33 with filing
M&R – 2: Customer Trouble Report Rate	Added Disaggregation: UNE Digital Loops < DS1 UNE Digital Loops ≥ DS1	Not reflected in MSS included in Exhibit PM-33 with filing
M&R – 3: Maintenance Average Duration	Added Disaggregation: UNE Digital Loops < DS1 UNE Digital Loops ≥ DS1	Not reflected in MSS included in Exhibit PM-33 with filing
M&R – 4: % Repeat Report Troubles within 30 Days	Added Disaggregation: UNE Digital Loops < DS1 UNE Digital Loops ≥ DS1	Not reflected in MSS included in Exhibit PM-33 with filing
M&R – 5: % Out of Service > 24 Hours	Added Disaggregation: UNE Digital Loops < DS1 UNE Digital Loops ≥ DS1	Not reflected in MSS included in Exhibit PM-33 with filing

Comparison of Florida Permanent Measures with Florida PSC 271 Measures

Measurement Description	Florida Permanent SQM	Florida PSC 271
M&R – 6 & 7	Miscellaneous wording changes and clarifications	
B – 1, B – 3 to B – 8	Miscellaneous wording changes and clarifications	
B – 2: Mean Time to Deliver Invoices - CRIS - CABS	Minor Exclusion Changes Within 6 Business Days Within 8 Business Days	Parity with Retail
B – 9: % Daily Usage Feed Errors Corrected in X Business Days	New Measure	
B – 10: % Billing Errors Corrected in X Days	New Measure	
OS – 1, 2 and DA – 1, 2	Miscellaneous wording changes and clarifications	
D – 1 to D – 3	Miscellaneous wording changes and clarifications	
E – 1 to E – 3	Miscellaneous wording changes and clarifications	
TGP – 1 and TGP – 2	Miscellaneous wording changes, minor exclusion changes and clarifications	
C – 1: Collocation Average Response Time - Virtual Orders - Physical Caged Orders - Physical Cageless Orders	Benchmark: 15 Calendar Days 15 Calendar Days 15 Calendar Days	Benchmark: 20 Calendar Days 30 Calendar Days 30 Calendar Days
C – 2: Collocation Average Arrangement Time - Virtual - Augment w/o space increase - Augment with space increase - Physical Caged - Augment w/o space increase - Augment with space increase	Minor Exclusion Changes Benchmark: 60 Calendar Days 45 Calendar Days 60 Calendar Days 90 Calendar Days 45 Calendar Days 90 Calendar Days	Benchmark: 50 Calendar Days (Ordinary) 75 Calendar Days (extraordinary) 90 Calendar Days

Comparison of Florida Permanent Measures with Florida PSC 271 Measures

Measurement Description	Florida Permanent SQM	Florida PSC 271
- Physical Cageless	90 Calendar Days	60 Calendar Days (Ordinary) 90 Calendar Days (Extraordinary)
- Augment w/o space increase	45 Calendar Days	
- Augment with space increase	90 Calendar Days	
C - 3: % of Due Dates Missed	Miscellaneous wording changes and clarifications	
CM – 1: Timeliness of Change Management Notices	98% on Time	95% on time >=30 Days of Release
CM – 2: Average Delay Days for Change Management Notices	<= 5 Days Minor Exclusion Changes	<= 8 Days
CM – 3: Timeliness of Documents Associated with Change	98% on Time Minor Exclusion Changes	95% >= 30 for new feature coding 95% > 5 days for documentation defects, correction or clarifications
CM – 4: Change Management Documentation Average Delay Days	<= 5 Days	<= 8 Days
CM – 5: Notification of Interface Outages	Miscellaneous wording changes and clarifications	
BFR –1, BFR – 2	Not Ordered by FPSC	